

1 MELINDA HAAG (CABN 132612)  
United States Attorney

2 J. DOUGLAS WILSON (DCBN 412811)  
Chief, Criminal Division

3 DAMALI TAYLOR (CABN 262489)  
4 MARC WOLF (CABN 254495)  
5 Assistant United States Attorneys

6 450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102  
7 Telephone: (415) 436-6758  
Facsimile: (415) 436-6753  
E-Mail: damali.taylor@usdoj.gov; marc.wolf@usdoj.gov

8 Attorneys for the United States of America

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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

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14 UNITED STATES OF AMERICA ) ) NO. CR-13-0794-WHA  
15 v. ) )  
16 CESAR CASTELLANOS, *et al.*, ) ) MOTION FOR LEAVE TO FILE EXHIBITS  
17 Defendants. ) ) UNDER SEAL IN SUPPORT OF  
 ) GOVERNMENT'S OPPOSITIONS TO  
 ) DEFENDANT CASTELLANOS' MOTION TO  
 ) SUPPRESS EVIDENCE AND PROPOSED ORDER

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I, Marc Price Wolf, declare as follows:

1. I am a Special Assistant United States Attorney in the Office of Melinda Haag, United States Attorney for the Northern District of California. I am currently assigned to the Strike Force/Organized Crime Unit of the Criminal Division. I am one of the attorneys assigned to the prosecution of the above-captioned matter. Because some of the information contained therein could expose confidential information pertaining to witnesses, I respectfully make this request for leave to file the following exhibits under seal, pursuant to Criminal Local Rule 56-1.

- a. Exhibit A to the Declaration of Marc Price Wolf (VSP 0004250 through VSP 0004272); and

b. Exhibit B to the Declaration of Marc Price Wolf (VSP-0000406 – VSP-0000407)

2. Each of the above-referenced exhibits were provided to the defense in discovery. Exhibit A includes the search warrant and affidavit in support of the search warrant that is the subject of defendant Castellanos' motion to suppress. Exhibit B is a police report relevant to the incident that is the subject of defendant Castellanos' motion to suppress.
3. These materials contain identifying information pertaining to civilian witnesses whose identities are partially protected in materials provided by the government.
4. These Exhibits are the type of documents that are appropriate for filing under seal under the local rules for the Northern District of California.

**WHEREFORE**, the government respectfully requests this Court to grant this motion to file under seal.

DATED: July 29, 2014

Respectfully submitted,

MELINDA HAAG  
United States Attorney

By: /s/  
MARC PRICE WOLF  
Special Assistant United States Attorney

## **ORDER**

Upon motion of the United States, and good cause appearing, IT IS HEREBY ORDERED  
that the United States may file under seal copies of Exhibits A and B to the Declaration of Marc Price  
Wolf in Support of its Opposition to Defendant Castellanos' Motion To Suppress.

## IT IS SO ORDERED.

Dated: July 31, 2014.

  
Honorable William H. Alsup  
United States District Judge